

ENDANGERED HABITATS LEAGUE

DEDICATED TO ECOSYSTEM PROTECTION AND SUSTAINABLE LAND USE



November 14, 2013

Chuck Bonham, Director
California Dept. of Fish and Wildlife
1416 9th Street, 12th Floor
Sacramento, CA 95814
director@wildlife.ca.gov

RE: Proposed Annenberg Interpretive Center in Ballona Wetlands Ecological Reserve – *Opposition*

Dear Director Bonham:

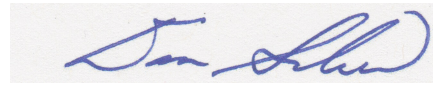
The Endangered Habitats League (EHL) fully respects the purposes and environmental commitment of the Department, Annenberg Foundation and other parties involved in the Interpretive Center MOU, yet urges that a more publicly accountable process be developed for the use and management of the Ballona Wetlands Ecological Reserve. Until such time, EHL regrettably opposes the construction of this or other facilities on general policy grounds. We also have specific concerns over aspects of the project as proposed. For your reference, EHL is Southern California's only regional conservation group. We have been active participants in Natural Communities Conservation Planning since 1991 and have helped create Ecological Reserves in Riverside and San Diego Counties.

On a broad policy level, the management of State Ecological Reserves, including visitor uses and facilities, should be determined by the Department using public input and through publicly accessible processes. The MOU contravenes such an approach and the Department would set an adverse precedent if this became a "model" for public-private partnerships. *Furthermore, public-private partnerships should only fund management actions or facilities identified and adopted in a standard and open planning process.* If, instead, public-private partnerships supplant an open process, then we create the perception that public lands are being inappropriately used to advance private agendas, even if those agendas align with State interests. This MOU should be rejected on these general policy and process grounds.

On a site-specific level, in EHL's view, the proposed interpretive center is over-scaled and should not contain a domestic pet facility. That is not to say that the ultimate interpretive programs should not educate the public on the severe dangers posed by feral cats and other uncontrolled domestic animals to wildlife. If given the opportunity via a new planning process, we would urge the Department to focus available public and private interpretive resources on programs more than structures.

We believe the Department and other involved agencies erred in not developing a publicly accountable visitor use plan for the Ballona Wetlands Ecological Reserve. The result has created the unfortunate appearance of trading public trust responsibilities for monetary considerations. Recognizing that the Department is the ultimate decision-maker, we urge the Department and other MOU entities to step back and collaborate with other stakeholders during a more inclusive planning exercise. The result should be able to constructively accommodate the interests of those involved to date in interpretive facilities and management actions. EHL would be happy to participate.

Yours truly,



Dan Silver
Executive Director

cc:

Sonke Mastrup, Executive Director
California Fish and Game Commission
sonke.mastrup@fgc.ca.gov

Ballona Wetlands Restoration Project
c/o Donna McCormick
DONNA.MCCORMICK@icfi.com

Rick Mayfield, California Department of Fish & Wildlife
Rick.Mayfield@wildlife.ca.gov

Mary Small, State Coastal Conservancy
msmall@scc.ca.gov

Shelley Luce, Santa Monica Bay Restoration Foundation
sluce@santamonicabay.org

Leonard Aube, The Annenberg Foundation
LAube@annenbergfoundation.org